

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CIVIL ACTION NO. 17-cv-136

KLEINBANK,

Defendant.

STIPULATION FOR DISMISSAL WITH PREJUDICE

WHEREAS, on January 13, 2017, United States of America, through the Department of Justice ("Plaintiff"), initiated the instant litigation against KleinBank ("Defendant" or "Bank"); and

WHEREAS, Defendant denies the conduct alleged therein and further denies any liability whatsoever; and

WHEREAS, to resolve voluntarily the claims asserted, the parties agree that it is to their mutual benefit to terminate the litigation subject to the Settlement Agreement that the parties executed on May 8, 2018 (see Exhibit A attached hereto) without either party admitting any claim, matter, or defense;

NOW, THEREFORE, the parties hereby stipulate that all claims in the above matter are dismissed with prejudice, subject to the procedures for resolving disputes between the parties that are set forth in Paragraphs 8, 11, 20, and 22-25 of the Settlement Agreement. The parties further agree that the claims are dismissed without costs or attorneys' fees to any party.

In witness whereof, the parties have affixed their respective signatures on the dates set forth below.

For United States of America:

Date: May 8, 2018

JOHN M. GORE
Acting Assistant Attorney General
Civil Rights Division


SAMEENA SHINA MAJEED

Chief
LUCY G. CARLSON
Deputy Chief
AURORA BRYANT
ERNESTINE WARD
CHRISTOPHEHER BELEN
Trial Attorneys
Housing and Civil Enforcement Section
Civil Rights Division
950 Pennsylvania Avenue, NW
Northwestern Building, 7th Floor
Washington D.C. 20530
Phone: (202) 616-2602
Email: aurora.bryant@usdoj.gov

For KleinBank:

By: 
John W. Lundquist

Fredrikson & Byron P.A.
200 South Sixth Street, Suite 4000
Minneapolis, MN 55402

May 7, 2018

AGREED:


Doug Hile
CEO, KleinBank

May 3, 2018